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Attorney for Creditor  
Partners for Payment Relief DE II, LLC

IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF ARIZONA – PHOENIX DIVISION

In re:	)	CASE NO.: 2:16-bk-08714-PS
	)	
Joe & Frances Delgado	)	Chapter 13
	)	
Debtors.	)	
	)	
Partners for Payment Relief DE II LLC	)	SUPPLIMENTAL DECLARATION IN
	)	SUPPORT OF MOTION FOR RELIEF
	)	
Movant,	)	Re: Real property located at
	)	5828 W Redfield Road, Glendale AZ 85306
	)	
	)	
	)	
	)	
	)	
	)	
	)	

I, Robert Paulus, declare under penalty of perjury as follows:

1. I am an employee of Partners for Payment Relief DE II LLC its successors and/or assignees, which is the entity that has the right to foreclose by virtue of being the owner and holder of the note. This declaration is provided in support of the Motion for the Relief from Stay (“the Motion”).

1           2.       I am familiar with the manner and procedure by which the records of Movant are  
2 obtained, prepared, and maintained. Those records are obtained, prepared, and maintained by  
3 employees or agents of Movant in the performance of their regular business duties at or near the  
4 time, act, conditions, or events recorded thereon. The records are made either by persons with  
5 knowledge of the matters they record or from information obtained by person with such knowledge.  
6 It is my business practice to maintain these records in the regular course of business.

7           3.       Movant has been responsible for the handling of all matters relative to the underlying  
8 loan prior to the filing of the within motion, including but not limited to processing of all payments  
9 received, crediting of received payments, adding all proper charges to the loan, confirming the  
10 maintenance of hazard insurance and property taxes, property preservation where appropriate,  
11 communicating with and responding to the borrower on all matters relative to the loan, and the  
12 commencement of non-judicial foreclosure proceedings where appropriate. All activities on the loan  
13 advanced by Movant were advanced in accordance with the terms of the Deed of Trust and Note.

14           4.       The borrowers, Joe and Frances Delgado, have executed and delivered or are  
15 otherwise obligated with respect to that certain promissory note referenced in the Motion ("the  
16 Note"). Pursuant to that certain Deed of Trust referenced in the Motion ("the Deed of Trust"), all  
17 obligations of the Debtor under and with respect to the Note and the Deed of Trust are secured by  
18 the property referenced in the Motion.

19           5.       As of 11/21/2018, the unpaid principal balance of the Note was \$19,241.49.

20           6.       As of 11/21/2018, there are one or more defaults in paying post-petition amounts due,  
21 pursuant to the terms of the Note, as set forth below.

22           POST-PETITION DELINQUENCIES:

Monthly Payments:	28	at	\$129.82	\$3,634.96
Late Charges				\$434.83
Total Post-petition Delinquencies:				\$4,069.79

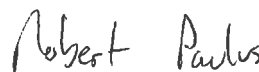
26           7.       The next payment under the terms of the Note will come due 12/1/2018 and is in the  
27 amount of \$129.82.

1  
2 I declare under penalty of perjury under the laws of the United States of America that the  
3 foregoing is true and correct.  
4

5 Executed on 11/21/2018 (Date) Berwyn (City), PA (State)  
6

7  
8 

9  
10  
11 Signature

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13 

14  
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25  
26  
27  
28 Print Name

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UNITED STATES BANKRUPTCY COURT  
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In Re: ) CASE NO.: 2:16-bk-08714-PS  
Joe Delgado and Frances Delgado, ) CHAPTER 13  
Debtors. ) **CERTIFICATE OF SERVICE**

**CERTIFICATE OF SERVICE**

I am employed in the County of Orange, State of California. I am over the age of eighteen and not a party to the within action. My business address is: 1920 Old Tustin Avenue, Santa Ana, CA 92705.

I am readily familiar with the business's practice for collection and processing of correspondence for mailing with the United States Postal Service; such correspondence would be deposited with the United States Postal Service the same day of deposit in the ordinary course of business.

On November 21, 2018 I served the following documents described as:

1

2 • **SUPPLIMENTAL DECLARATION IN SUPPORT OF MOTION FOR**

3 **RELIEF**

4 on the interested parties in this action by placing a true and correct copy thereof in a sealed

5 envelope addressed as follows:

6 (Via United States Mail)

7 **Debtor**

8 JOE A DELGADO  
5828 WEST REDFIELD ROAD  
GLENDALE, AZ 85306

9 **Joint Debtor**

10 FRANCES M DELGADO  
5828 WEST REDFIELD ROAD  
GLENDALE, AZ 85306

11 **Debtor's Counsel**

12 LEONARD V. SOMINSKY  
13 LEONARD V. SOMINSKY, ESQ., PC.  
14 2700 N. 3RD STREET  
15 SUITE 2006  
16 PHOENIX, AZ 85004

**Trustee**

EDWARD J. MANEY  
101 N. FIRST AVE., SUITE 1775  
PHOENIX, AZ 85003

**U.S. Trustee**

OFFICE OF THE U.S. TRUSTEE  
230 NORTH FIRST AVENUE  
SUITE 204  
PHOENIX, AZ 85003

17 xx (By First Class Mail) At my business address, I placed such envelope for deposit with

18 the United States Postal Service by placing them for collection and mailing on that date

19 following ordinary business practices.

20        Via Electronic Mail pursuant to the requirements of the Local Bankruptcy Rules of the

21 Eastern District of California

22 xx (Federal) I declare under penalty of perjury under the laws of the United States of

23 America that the foregoing is true and correct.

Executed on November 21, 2018 at Santa Ana, California

24 /s/ Krystle Miller

25 Krystle Miller

26

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